

In the United States District Court for  
the District of Delaware

Kenneth L. Holland  
- Plaintiff -

- vs -

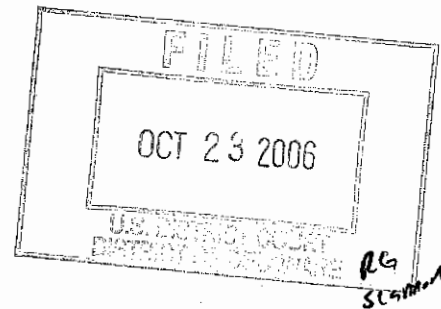
C.A. NO. 05-464 (SLR)

Stanley Taylor, et al.

Notice of Service of Discovery Materials

I, Kenneth Holland, Response to Defendants Request  
for production of Document. Plaintiff will send more  
materials, when Plaintiff received it.

To: Eileen Kelly  
Deputy Attorney General  
820 N. French St. 6<sup>th</sup> Floor  
Wilmington, DE 19801



KENT GENERAL  
HOSPITAL**EMERGENCY**

K05293-00155 00-1238297 ERK  
HOLLAND, KENNETH L  
M DOB: 05/15/1970 35Y (302) 734-3371  
PHYSICIAN, EMERGENC 10/20/05

DATE:

10-20-05

DOB:

## INSTRUCTIONS FOR CARE FOLLOWING DISCHARGE FROM THE EMERGENCY DEPT:

Kent General Hospital Emergency Personnel are specially trained to deal with emergencies. While we are here to help with your immediate health problems the treatment you receive is not meant to take the place of the complete care your doctor will give you. We will advise your local family doctor what we have treated you for by sending him/her a copy of your Emergency Department record. In most cases, we recommend that you see your family doctor for follow-up care. If you do not have a family doctor, please tell us, and we will give you a list of names for you to choose from.

## SPECIAL INSTRUCTIONS:

see instructions

## MEDICATION INSTRUCTIONS:

- ☒ Fill prescriptions and take medications according to directions.
- ☒ Do not drink alcohol or take sedatives with this medication.
- ☒ Do not drive, operate machinery, or perform dangerous tasks while taking this medication. Vicodin
- ☒ Take this medication with food. Motrin -
- ☐

## FOLLOW-UP INSTRUCTIONS:

- ☐ See your family doctor.
- ☒ Return to the Emergency Department. If worse
- ☒ See Dr. Cooper in 1 week if not better
- ☐ No work / school
- ☐ Light duty
- ☐ May return to work / school
- ☐ Call for Occupational Health appt.
- ☐ in \_\_\_\_\_ days Call for appt.
- ☐ on \_\_\_\_\_ at \_\_\_\_\_
- ☐ No gym / sports

PHYSICIAN SIGNATURE: (ICA)

## I UNDERSTAND THAT:

I should see my family doctor or return to the Emergency Department if I become worse or develop further problems.

If x-rays were taken, they will be read by a radiologist and I may be called for a recheck or further x-rays if necessary.

I am responsible for arranging my follow-up care.

I have received the above instructions and they were explained to me by an emergency physician or nurse.

INSTRUCTED BY: K.L.

DATE: 10/20/05

TIME: 1255

I have read and understand these instructions.

\* If remitting payment, please make sure address on other side appears through window \*



**DO NOT SEND PAYMENTS OR CORRESPONDENCE TO THIS ADDRESS.**

**KENT DIAGNOSTIC RADIOLOGY**

PO Box 835

Oaks, PA 19456



03-06-06

**OFFICE PHONE: 302-674-2202**

Office Hours: 9AM - 4PM Mon. - Fri.

Fax: 1-302-674-8359

KENNETH L HOLLAND  
211 N NEW STREET  
DOVER, DE 19901

Patient Name: KENNETH L HOLLAND  
Account #: 8529300155  
Amount Due: \$39.00

**FINAL NOTICE!**

According to our records, your balance of \$39.00 is delinquent and remains unpaid to our practice. Please pay the amount in full immediately using the bottom portion of this letter or call 302-674-2202 to make payment arrangements.

If payment is not received within 10 days your account may be placed for collection without further involvement by KENT DIAGNOSTIC RADIOLOGY.

Please understand that failure to pay could adversely affect your credit rating.

Respond to this collection notice today.

CC: Collection Coordinator

**FINAL NOTICE!**

Please detach and return bottom portion with your payment in enclosed envelope

**GUARANTOR NAME AND ADDRESS:**

KENNETH L HOLLAND  
211 N NEW STREET  
DOVER, DE 19901

Patient Name: KENNETH L HOLLAND  
Account #: 8529300155  
Amount Due: \$39.00

AMOUNT OF PAYMENT	\$
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Payment Due 3/16/06
------------------------

**SERVICES PROVIDED BY:**

**KENT DIAGNOSTIC RADIOLOGY  
ASSOCIATES, P.A.  
P. O. BOX 1256  
DOVER, DE 19903-1256**  
|||||

↑ **PLEASE SEND ALL PAYMENTS AND  
CORRESPONDENCE TO THIS ADDRESS.**

**Statement****S DE Oral Maxillofacial Surgery**

1001 S. Bradford Street

Suite 2

Dover, DE 19904

Date	04/12/2006
Account	12044
Patient	Kenneth Holland

Total Amount Due: \$-165.00

Due Date: 03/23/2006

Amount Enclosed:\$ \_\_\_\_\_

Kenneth Holland

211 N. New st

Dover, DE 19901

Page: 1

Post Date	Charges and Credits	Service Date	Amount
	PREVIOUS BALANCE .....		0.00
04/12/2006	AdvPaymt/Cash/Self		-165.00
	ENDING BALANCE .....		-165.00

1-30	31-60	61-90	91-120	120+
-165.00	0.00	0.00	0.00	0.00

We accept all major credit cards.

Please call 1-302 674-4450 for any billing questions

S DE Oral Maxillofacial Surgery  
(302) 674-4450

*Thank You*





05-130

PUBLIC DEFENDER OF THE STATE OF DELAWARE  
ELBERT N. CARVEL STATE OFFICE BUILDING  
820 NORTH FRENCH STREET, THIRD FLOOR  
P.O. BOX 8911  
WILMINGTON, DELAWARE 19801

LAWRENCE M. SULLIVAN  
PUBLIC DEFENDER

WILLIAM F. PRETTYMAN  
INVESTIGATOR  
SPECIAL INVESTIGATIVE UNIT

ANGELO FALASCA  
CHIEF DEPUTY

TELEPHONE  
(302) 577-5158

MEMORANDUM

To: Todd E. Conner, Esquire.

From: William Prettyman  
Special Investigations Unit

Date: 2-2-05

Re: Kenneth Holland

*Trid*

*7-15-05*

✓ *Jerry Smith*  
~~Jerry Smith~~  
1804 W. 3<sup>rd</sup> Street  
Wilmington, DE 19805  
Phone: 888-1883

*00306883*

*→ DCC*

Jerry was interviewed at the Plummer Center on 1-27-05. He stated Kenny and Lt. Bramble had words as Kenny waited in the chow line. Jerry said Lt. Bramble's favorite words are "I'll mace you." As Kenny was sitting and eating his breakfast, Lt. Bramble came up to him and told Kenny not to say another word or he would mace him.

Jerry said after breakfast they went back to their pod and maybe 30-45 minutes later Lt. Bramble came onto the pod. He said Lt. Bramble never came on the pod before.

Kenny approached Lt. Bramble and asked him why did he speak to him that way at the chow line. Kenny thought Lt. Bramble was disrespectful to him and wanted to know why he acted that way toward him.

Lt. Bramble responded, "You're going to SVOP, put your hands behind your back." Jerry said this was so Lt. Bramble could cuff Kenny. Kenny told Lt. Bramble he didn't do anything wrong and he refused to put his hands behind his back.

Lt. Bramble walked toward Kenny with his handcuffs in his hand and tried to grab him. Kenny refused to be handcuffed and Lt. Bramble maced him.

Lt. Bramble called for help on his radio, but Kenny was already cuffed by the time the first correctional officer came to the pod. Jerry said he never saw Kenny pick up a chair at any time during the scuffle with Lt. Bramble. He said when Kenny fell to the floor after being maced and cuffed, the lieutenant continued to mace him.

✓ Steven Mullins

✓ ~~Steven Mullins~~

22 Holland Circle, Apt. 32

William Penn Village Apartments

New Castle, DE 19720

Phone: 326-2587

→ not custody

16 Metten Rd. Newark 19713

→ phone # disconnected

Steven was interviewed at the Plummer Center on 1-27-05 after Jerry Smith said he had witnessed the incident between Kenny Holland and Lt. Bramble.

Stevens said Lt. Bramble had an attitude with their whole pod and he didn't like Kenny particularly. He said on the day in question, Lt. Bramble came onto their pod and tried to intimidate Kenny. As he spoke to Kenny, Lt. Bramble held his hand on his mace canister. Kenny saw that and told Lt. Bramble, "Don't be shaking your can at me."

Steven said when the lieutenant took his mace off his belt and began shaking it, that's when Kenny picked up the plastic chair to block the spray of mace. Steven said he saw the lieutenant backing up and he saw the chair strike the lieutenant, but he didn't see if Kenny hit the lieutenant with the chair or if it was thrown at him. From where he stood he didn't have a good view. When the incident was over, Steven did observe a red mark on the left side of the lieutenant's neck.

Steven said he doesn't remember Jerry Smith being on the pod at the time of the incident. He said Jerry was assigned to that pod, but he doesn't remember seeing him there.

✓ Lateef Dickerson

✓ ~~Lateef Dickerson~~

919 Janvier Court

Middletown, DE 19709

953 Canal Dr. Dover

→ not in custody

Lateef was interviewed by videophone on 1-31-05 from the CVOP. He said the day of the incident Kenny and Lt. Bramble "got into it" at breakfast. When they went back to their pod, Lt. Bramble came onto their pod and the argument continued. As they argued, Kenny told the lieutenant "You need to stop threatening to mace me." With that being said, Lt. Bramble pulled out his mace and maced Kenny.

Lateef said Kenny put his hands up to block the spray of mace, but he never saw him pick up a chair. Lateef said the whole incident occurred right in front of his bunk and the lieutenant sprayed Kenny for no reason.



✓ James White  
~~James White~~  
 234 N. Queen Street  
 Dover, DE 19901  
 Phone: (302) 734-7275

00390211  
 → Sussex Half-way

James was interviewed by videophone on 1-31-05 from the CVOP. He said the incident between Kenny and Lt. Bramble had started at breakfast. Kenny wanted to finish his tray and they argued about that. During this first argument Lt. Bramble took out his mace.

Kenny got up and went back to the pod. Shortly afterward, the lieutenant shows up on the pod. Kenny approaches the lieutenant and asks him why has he threatened him so many times with his mace. James thought that Kenny was being "a real gentleman" about it. James said the lieutenant tried to put Kenny in a headlock but Kenny slammed him.

James said he was standing alongside of Kenny when the incident on the pod took place. He said he was trying to calm Kenny down.

James said Kenny finally just gave up and laid down on the floor. He was on the floor before any of the other correctional officers arrived on the pod. James said he never saw Kenny pick up a chair.

Paul Hayes  
~~Paul Hayes~~  
 100 Fantasia Drive  
 Newark, DE 19713  
 Phone: 456-1657

100 Fantasia Dr. Newark 19713  
 → not in custody  
 → phone # disconnected

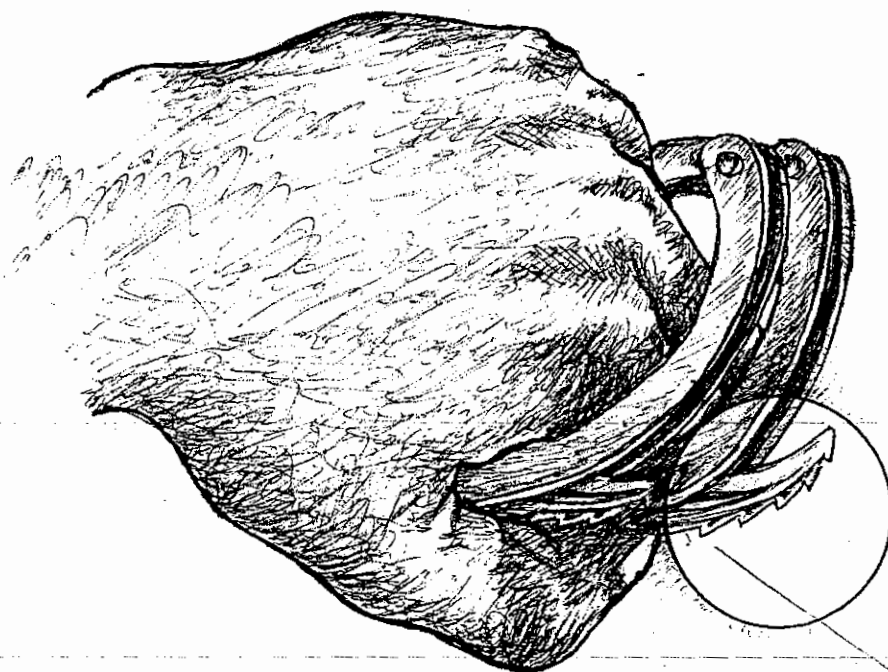
Paul was interviewed by phone from his home on 2-1-05. He said he had been released from Sussex on 1-31-05 and he is currently on home confinement.

Paul said Lt. Bramble had said something ignorant to Kenny at breakfast. When the lieutenant came on the pod a short time later, Kenny and the lieutenant got into an argument over what had happened at breakfast.

Paul said the lieutenant maced Kenny and Kenny picked up a chair to defend himself against the spray of the mace. Paul said he saw Kenny knock the can of mace out of the lieutenant's hand as he picked up the chair, but he never saw Kenny hit the lieutenant with the chair. Kenny and the lieutenant scuffled on the pod floor and Paul witnessed this from the front of the pod.

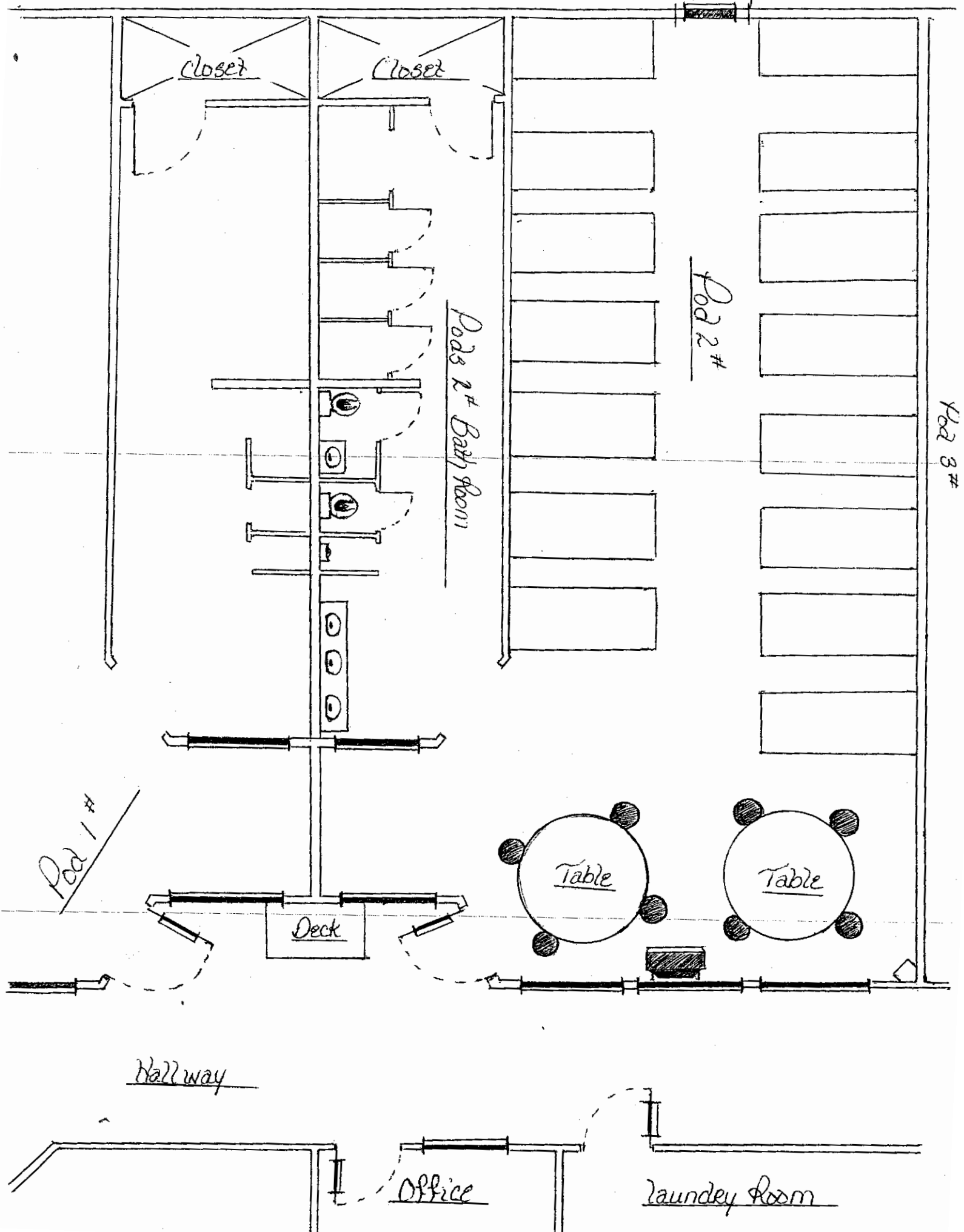
Paul said the pod was full at the time, but he doesn't remember who was there watching the incident.





**Teeth**

**CAUSED INJURIES  
TO NECK AND THUMB**





IM Kenneth Holland  
SBI# 164800 UNIT 28-A-U-3  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977

Clerks Office  
United States District Court  
844 N. King St  
Wilmington, De  
19801

